

# **EXHIBIT 11**

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF NEW JERSEY

3 IN RE: JOHNSON & :  
4 JOHNSON TALCUM POWDER :  
5 PRODUCTS MARKETING, :  
6 SALES PRACTICES, AND :  
7 PRODUCTS LIABILITY : CASE NO. 16-2738  
8 LITIGATION : (FLW) (LHG)  
9 :  
10 THIS DOCUMENT RELATES :  
11 TO ALL CASES :  
12 :  
13 MDL Docket No. 2738 :  
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15 - - -  
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18 Monday, January 7, 2019  
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12 Videotaped Oral Deposition of  
13 JUDITH K. WOLF, M.D. taken pursuant to  
14 notice, was held at the Hilton Austin, 500  
15 East 4th Street, Austin, Texas, beginning at  
16 9:08 a.m., on the above date, before Micheal  
17 A. Johnson, Registered Diplomate Reporter,  
18 Certified Realtime Reporter, and Notary  
19 Public for the State of Texas.  
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1 Q. Have you investigated whether  
2 or not there is an amount of talcum powder  
3 that can be used perineally without  
4 increasing the risk for ovarian cancer?

5 MS. O'DELL: Objection, asked  
6 and answered.

7 A. I don't know if there is an  
8 amount that's safe. I don't know how I could  
9 ethically test that. I'm not aware of  
10 anything in the literature that says, "This  
11 dose is safe, this dose is not." Because  
12 even in all of the studies, what is a dose?  
13 One shake? Two shakes? A hard shake? A  
14 light shake?

15 BY MS. BROWN:

16 Q. Is your opinion, Dr. Wolf, that  
17 some amount of perineal talcum powder use  
18 causes ovarian cancer, is that opinion  
19 dependent on an assumption that talcum powder  
20 is contaminated with asbestos?

21 A. No, because --

22 MS. O'DELL: Object to the  
23 form.

24 A. -- talcum powder is a mix of

1 things, right? It's a mix of platy talc,  
2 fibrous talc, asbestos, heavy metals have  
3 been found in it, nickel and chromium and  
4 cobalt, and then all of the fragrances. And  
5 I have seen the expert report of Michael  
6 Crowley, where he assessed the irritant  
7 quality of some of the fragrances. And so  
8 when I look at the talcum powder product, I  
9 look at it as a whole.

10 BY MS. BROWN:

11 Q. Do you believe there is  
12 asbestos in talcum powder?

13 A. I've seen evidence that there  
14 is asbestos found in at least 60 percent of  
15 talcum powder that's been evaluated that I've  
16 seen.

17 Q. Is it your opinion in this  
18 case, that 60 percent of talcum powder is  
19 contaminated with asbestos?

20 MS. O'DELL: Object to the  
21 form, asked and answered.

22 A. In the reports that I've seen,  
23 60 percent of the time there was evidence of  
24 asbestos.

1 MS. O'DELL: Object to the  
2 form.

3 A. I didn't say these cause  
4 ovarian cancer. I say that they're known to  
5 be carcinogenic and could be the cause of why  
6 talcum powder products causes ovarian cancer.  
7 And the other thing in there that I know can  
8 be inflammatory, from reading Dr. Crowley's  
9 report, are some of the fragrances that are  
10 used. And since inflammation is a risk  
11 factor and an initiator in -- leads -- is  
12 related to the progression of ovarian cancer,  
13 I have concerns about those.

14 BY MS. BROWN:

15 Q. And your opinion, then, Doctor,  
16 as I understand it, is that you're not sure  
17 which or what combination of all the items  
18 you just listed to me are working to cause  
19 cancer; is that right?

20 MS. O'DELL: Object do the  
21 form.

22 A. My opinion is that it's the  
23 talcum powder product as a whole that  
24 increases the risk of ovarian cancer, and

1 I've listed things that I know are in there  
2 that can be carcinogenic or inflammatory.

3 BY MS. BROWN:

4 Q. And to be clear, though, you  
5 don't have an opinion as to the amounts of  
6 any of the items you just listed for me as  
7 they appear in baby powder, right?

8 MS. O'DELL: Object to the --  
9 object to the form.

10 BY MS. BROWN:

11 Q. That was a bad question.  
12 Here's what I want to know. I understand  
13 your opinion is based on your assumption that  
14 fragrance, platy talc, fibrous talc, heavy  
15 metals and asbestos are in Johnson &  
16 Johnson's products, correct?

17 MS. O'DELL: Object to the  
18 form.

19 A. It's in talcum powder product.

20 BY MS. BROWN:

21 Q. And that would include Johnson  
22 & Johnson's products, correct?

23 A. Would include any talcum powder  
24 product.